

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)
(Jointly Administered)

Re: Docket No. 656

**ORDER (I) AUTHORIZING THE REJECTION OF
CERTAIN EXECUTORY CONTRACTS AND
UNEXPIRED LEASES EFFECTIVE AS OF DATES
SPECIFIED HEREIN AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)² of the Debtors for entry of an order (this “**Order**”) pursuant to sections 105 and 365 of the Bankruptcy Code, (a) authorizing the rejection of certain executory contracts and unexpired leases, as set forth on **Schedule 1** attached hereto, effective as of the dates set forth in **Schedule 1**, and (b) granting related relief, as more fully set forth in the Motion; and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

the Motion (the “**Hearing**”); and the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors, their stakeholders, and all other parties-in-interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Each of the unexpired leases and executory contracts set forth on **Schedule 1**, attached hereto, are rejected, effective as of the respective effective date of rejection set forth in **Schedule 1** for each unexpired lease or executory contract.
3. Any claim held by the Debtors against the Counterparties, whether or not such claims arise under, are related to the rejection of, or are independent of the Contracts, are fully preserved.
4. Any claims based on the rejection of the Contracts shall be filed in accordance with the Bar Date Order by no later than 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days after service of this Order on the applicable Counterparty.
5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity, extent, perfection, priority, allowability, enforceability, or character of any claim or any security interest which purportedly secures such claim or other asserted right or obligation, or a waiver or other limitation on the Debtors’ ability to contest the same on any ground permitted by bankruptcy or applicable non-bankruptcy law; (b) a waiver of the Debtors’ or any appropriate party in interest’s rights to dispute the amount of, basis for, or validity of any claim against the Debtors; (c) a

promise to pay any claim; (d) a waiver of any claims or causes of action which may exist against any creditor or interest holder; (e) an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code, except as specified herein, and nothing herein otherwise affects the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease with any party, except as specified in this Motion; (f) granting third-party beneficiary status or bestowing any additional rights on any third party; (g) being otherwise enforceable by any third party, or (h) an admission by the Debtors that such Contract is, in fact, executory.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

7. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Schedule 1

Rejected Executory Contracts & Unexpired Leases

Schedule 1

Rejected Executory Contracts & Unexpired Leases

Counterparty or Landlord	Counterparty of Landlord Address	Contract or Lease Description	Debtor	Effective Date of Rejection
Akebono Corp.	34385 W Twelve Mile Road Farmington Hills, MI 48331	Warranty Sharing Agreement dated January 17, 2023	Lordstown EV Corporation	11/1/2023
Akebono Corp.	34386 W Twelve Mile Road Farmington Hills, MI 48331	Any other agreements with Akebono Corp., to the extent that they are executory, including but not limited to the following purchase orders: Lordstown EV Corp. Schedule Agreement Purchase Order Nos. 114549, 114550, 114551, 114552, 117874, and 117875	Lordstown EV Corporation	11/1/2023
Akebono Corp.	34387 W Twelve Mile Road Farmington Hills, MI 48331	Lordstown Motors Corp. Purchase Order No. 106190	Lordstown Motors Corp.	11/1/2023
Amerit Fleet Solutions, Inc.	1331 N. California Blvd Ste 150 Walnut Creek, CA 94596	Fleet Maintenance & Service Agreement dated January 9, 2023	Lordstown EV Corporation	11/1/2023
Applied Medical Resources Corporation	22872 Avenida Empresa Rancho Santa Margarita, CA 92688	Standard Industrial/Commercial Single-Tenant Lease dated October 22, 2020 for property located at 9451 Toledo Way, Irvine, CA 92618, as amended by the First Amendment to Lease dated January 12, 2021	Lordstown Motors Corp.	12/31/2023
Bennie W Fowler, LLC	625 Dream Island Road Longboat Key, FL 34228	Purchase order 119005 dated July 2, 2023	Lordstown EV Corporation	11/1/2023
Brikho & Kallabat, P.C. DBA Joseph Kallabat and Associates, PC	7031 Orchard Lake Road Ste 302 West Bloomfield, MI 48322	Purchase order 119167 dated June 8, 2023	Lordstown EV Corporation	11/1/2023
CEVA Logistics U.S., Inc.	15350 Vickery Drive Houston, TX 77032	Services Agreement dated January 1, 2021	Lordstown EV Corporation	11/1/2023
CEVA Logistics U.S., Inc.	15350 Vickery Drive Houston, TX 77032	Short-term Warehouse Agreement dated December 1, 2020	Lordstown EV Corporation	11/1/2023
Cognizant Worldwide Limited	1 Kingdom Street Paddington Central, London W2 68D	Purchase order 106725 dated April 1, 2023	Lordstown EV Corporation	11/1/2023
Cognizant Worldwide Limited	1 Kingdom Street Paddington Central, London W2 68D	Purchase order 118230 dated January 18, 2023	Lordstown EV Corporation	11/1/2023
Cox Automotive Mobility Solutions, Inc	6205-A Peachtree Dunwoody Road, CP-12 Atlanta, GA 30328	Registration and Title Solutions Agreement Terms and Conditions dated February 8, 2023	Lordstown EV Corporation	11/1/2023
Cox Automotive Mobility Solutions, Inc	6205-A Peachtree Dunwoody Road, CP-12 Atlanta, GA 30328	Purchase order 118446 dated July 18, 2023	Lordstown EV Corporation	11/1/2023
Cox Automotive Mobility Solutions, Inc	6205-A Peachtree Dunwoody Road, CP-12 Atlanta, GA 30328	Purchase order 119185 dated July 18, 2023	Lordstown EV Corporation	11/1/2023
Cox Automotive, Inc - Manheim	P.O. Box 105156 Atlanta, GA 30348	Purchase order 118442 dated June 1, 2023	Lordstown EV Corporation	11/1/2023
Cox Automotive, Inc - Manheim	P.O. Box 105156 Atlanta, GA 30348	Purchase order 119133 dated June 22, 2023	Lordstown EV Corporation	11/1/2023
Detroit Engineered Products dba DEP	850 E Long Lake Rd Troy, MI 48085	Purchase order 118645 dated April 30, 2023	Lordstown EV Corporation	11/1/2023
devPHASE LLC	P.O. Box 498943 Cincinnati, OH 45249	Purchase order 113471 dated May 20, 2023	Lordstown EV Corporation	11/1/2023
HubSpot Inc.	25 First Street, 2nd Floor Cambridge, MA 02141	Customer Terms of Service dated December 17, 2022	Lordstown EV Corporation	11/1/2023
HubSpot Inc.	25 First Street, 2nd Floor Cambridge, MA 02141	Purchase order 118505 dated June 17, 2023	Lordstown EV Corporation	11/1/2023
iLoka, Inc. dba NewCloud Networks	160 Inverness Drive West, Suite 100 Englewood, CO 80112	Master Agreement dated December 15, 2021	Lordstown EV Corporation	11/1/2023

Counterparty or Landlord	Counterparty of Landlord Address	Contract or Lease Description	Debtor	Effective Date of Rejection
Intralinks, Inc.	622 3rd Avenue 10th Floor New York, NY 10017	Work Order dated July 11, 2023	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road, Suite 200 Bloomfield Hills, MI 48302	Purchase Order dated April 19, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Ste 200 Bloomfield Hills, MI 48302	Aruba Access Point Installation Services Quotation dated March 29, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Ste 200 Bloomfield Hills, MI 48302	Aruba WLAN Proposal Quotation dated March 26, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Ste 200 Bloomfield Hills, MI 48302	Select Areas 802.11 Site Survey Quotation dated March 26, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Ste 200 Bloomfield Hills, MI 48302	Network Deployment - Core and Access Layer Quotation dated April 21, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Ste 200 Bloomfield Hills, MI 48302	Palo Alto Deployment Quotation dated April 9, 2021	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Bloomfield Hills, MI 48302	APs and ClearPass License Quotation dated September 27, 2022	Lordstown Motors Corp.	11/1/2023
Logicalis, Inc.	2600 S Telegraph Road Bloomfield Hills, MI 48302	Purchase order 117854 dated October 31, 2022	Lordstown EV Corporation	11/1/2023
Manheim Remarketing, Inc.	P.O. Box 105156 Atlanta, GA 30348	Vehicle Services Agreement dated April 11, 2023	Lordstown EV Corporation	11/1/2023
Marelli North America, Inc.	633 Garrett Pkwy Lewisburg, TN 37091	Business award letter dated December 4, 2020	Lordstown EV Corporation	11/1/2023
Marelli North America, Inc.	634 Garrett Pkwy Lewisburg, TN 37091	Development services agreement dated 10/20/2020	Lordstown EV Corporation	11/1/2023
Marelli North America, Inc.	635 Garrett Pkwy Lewisburg, TN 37091	Marelli statement of work dated 11/17/2020	Lordstown EV Corporation	11/1/2023
Michigan Strategic Fund	300 North Washington Square Lansing, MI 48913	Michigan Business Development Program Grant Agreement dated February 17, 2021	Lordstown Motors Corp.	11/1/2023
Mosaic Corporation	3050 Northeast Pkwy Ste 100 Atlanta, GA 30360	Purchase order 110739 dated July 16, 2021	Lordstown EV Corporation	11/1/2023
Nexteer Automotive Corporation	3900 E Holland Rd Saginaw, MI 48601	Agreement Regarding ED&D Parts	Lordstown EV Corporation	11/1/2023
ODP Business Solution, LLC	PO Box 633211 Cincinnati, OH 45263	Purchase order 118854 dated May 8, 2023	Lordstown EV Corporation	11/1/2023
Paragon Die & Engineering Company	5225 33rd St. SE Grand Rapids, MI 49512	Purchase order 119189 dated June 20, 2023	Lordstown EV Corporation	11/1/2023
QT Company	3031 Tisch Way 110 Plaza West San Jose, CA 95128	Auto renewal invoice for Qt Design Studio Enterprise 9.30.23	Lordstown EV Corporation	11/1/2023
Red Dawn Intermediate I, Inc	3854 Broadmoor Ave SE Grand Rapids, MI 49512	Purchase order 118852 dated October 27, 2022	Lordstown EV Corporation	11/1/2023
Rentokil North America, INC dba Western Exterminator Company	P.O. Box 16350 Reading, PA 19612	Purchase order 118659 dated April 19, 2023	Lordstown EV Corporation	11/1/2023
Ricoh USA, Inc	P.O. Box 802815 Chicago, IL 60680	Lease Agreement dated 2/22/21	Lordstown EV Corporation	11/1/2023
Ricoh USA, Inc	PO Box 802815 Chicago, IL 60680	Purchase order 115234 dated July 14, 2023	Lordstown EV Corporation	11/1/2023
Robar Public Relations	1600 E Grand Blvd Unit #300 Detroit, MI 48211	Purchase order 118851 dated June 4, 2023	Lordstown EV Corporation	11/1/2023
Robert Half International Inc	2613 Camino Ramon San Ramon, CA 94583	Purchase order 119036 dated May 17, 2023	Lordstown EV Corporation	11/1/2023

Counterparty or Landlord	Counterparty of Landlord Address	Contract or Lease Description	Debtor	Effective Date of Rejection
Samsung SDI America, Inc.	4121 North Atlantic Blvd Auburn Hills, MI 48326	First Amended and Restated Long Term Supply Agreement dated November 22, 2021	Lordstown EV Corporation	11/1/2023
Service Express, LLC	3854 Broadmoor Ave SE Grand Rapids, MI 49512	Service Express Service Agreement 43076 dated October 16, 2022	Lordstown Motors Corp.	11/1/2023
Syngin Technology, LLC - Wallenius Wilhelmsen	100 South Ashley Dr. Tampa, FL 33602	Purchase order 119108 dated May 2, 2023	Lordstown EV Corporation	11/1/2023
Syngin Technology, LLC - Wallenius Wilhelmsen	100 South Ashley Dr. Tampa, FL 33602	Purchase order 119120 dated June 23, 2023	Lordstown EV Corporation	11/1/2023
Tata Consultancy Services Limited	Nirmal Building 9th Floor Nariman Point, India 400021	Project PLM Change Management and Integration Statement of Work dated August 1, 2022	Lordstown EV Corporation	11/1/2023
Tata Consultancy Services Limited	Nirmal Building 9th Floor Nariman Point, India 400021	Project Polarion Statement of Work dated February 16, 2022	Lordstown EV Corporation	11/1/2023
Tata Consultancy Services Limited	TCS House, Ravelin Street, Fort Mumbai, 400 001	Master Agreement for Professional Services dated December 10, 2020	Lordstown EV Corporation	11/1/2023
Transportation Research Center, Inc. dba TRC, Inc.	10820 State Route 347 PO Box B-67 East Liberty, OH 43319	Purchase order 113497 dated May 31, 2023	Lordstown EV Corporation	11/1/2023